

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION**

RADHA GEISMANN, M.D., P.C., individually)	
and on behalf of all others similarly situated,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 15-cv-603
)	
GE HEALTHCARE, INC.,)	
)	
<i>Defendant.</i>)	

**AGREED MOTION FOR EXTENSION OF
DEFENDANT’S RESPONSIVE PLEADING DEADLINE**

Defendant GE Healthcare, Inc. (“GE Healthcare”), with the agreement of Plaintiff Radha Geismann, M.D., P.C. (“Plaintiff”), respectfully requests a 30-day extension of time, from April 17, 2015 until and including May 18, 2015, in which to answer or otherwise respond to Plaintiff’s Complaint. In support of this motion, GE Healthcare states as follows.

1. On March 2, 2015, Plaintiff filed a Complaint against GE Healthcare in the Circuit Court of St. Louis County alleging violations of the federal Telephone Consumer Protection Act and Missouri Fraud and Deceptive Business Practices Act, and a claim for common law conversion.

2. GE Healthcare timely removed the Complaint to this Court on April 10, 2015, which makes its responsive pleading due seven days later on April 17, 2015. *See* Fed. R. Civ. P. 81(c)(2); (Dkt. 1).

3. GE Healthcare recently retained Reed Smith LLP to investigate and defend this action. Defendant requests an additional 30 days to conduct its investigation and craft a response

to Plaintiff's Complaint. This is GE Healthcare's first request for an extension and it is not being interposed for purposes of delay.

4. Counsel for Plaintiff, Brian Wanca, has indicated Plaintiff's agreement with the requested 30-day extension of Defendant's responsive pleading date.¹

WHEREFORE, Defendant GE Healthcare respectfully requests that the Court extend the deadline for responding to Plaintiff's Complaint by 30 days, until and including May 18, 2015.

Dated: April 13, 2015

Respectfully submitted,

GE HEALTHCARE, INC.,
Defendant

By: s/ Christine Czuprynski
One of Its Attorneys

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¹ Plaintiff served written discovery requests on Defendant along with its Complaint. However, Plaintiff's counsel has agreed that Defendant's obligation to answer Plaintiff's written discovery requests should be stayed until at least 30 days after the Court holds an initial scheduling conference in this matter.

CERTIFICATE OF SERVICE

I, Christine Czuprynski, an attorney for Defendant, hereby certify that on April 13, 2015, a true and correct copy of the foregoing **Agreed Motion for Extension of Defendant's Responsive Pleading Deadline** was served upon Plaintiff's counsel via first class U.S. mail, postage-prepaid, by causing it to be dropped in the mail slot at 10 S. Wacker Dr., Chicago, IL 60606 and addressed as follows:

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_____/s/ Christine Czuprynski